

BEFORE THE
PHYSICAL THERAPY BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation
Against:

Warren Cornwell, PT

License No. PT 23371

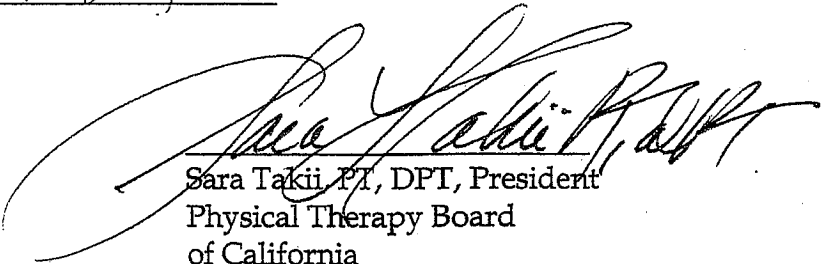
) Case #: 1D 2009 67557
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DECISION AND ORDER

The attached Stipulated Revocation of License and Order is hereby adopted by the Physical Therapy Board; Department of Consumer Affairs, State of California, as its Decision in the above-entitled matter.

This decision shall become effective on December 30, 2011

It is so ordered on November 30, 2011.


Sara Takii, PT, DPT, President
Physical Therapy Board
of California

1 KAMALA D. HARRIS
2 Attorney General of California
3 GAIL M. HEPPELL
4 Supervising Deputy Attorney General
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**BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

Case No. 1D 2009 67557

In the Matter of the Accusation Against:

WARREN SCOTT CORNWELL, P.T.
452 West Nees Avenue, #103
Fresno, California 93711

Physical Therapist License Number PT 23371

Respondent.

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

It is agreed by and between the parties to this action as follows:

PARTIES

1. Rebecca Marco (Complainant) is the Interim Executive Officer of the Physical Therapy Board of California (the Board) and brought this action solely in her official capacity. Complainant is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Jannsen L. Tan, Deputy Attorney General.

2. Respondent Warren Scott Cornwell, P.T. (Respondent) is represented in this proceeding by George Strasser of Baker Manock & Jensen, P.C., Attorneys at Law, 5260 N Palm Ave Ste. 421, Fresno, CA 93704.

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1 3. On or about July 2, 1998, the Board issued Physical Therapist license No.
2 PT 23371 to Respondent. The Physical Therapist license was in full force and effect at all times
3 relevant to the charges brought in Accusation number 1D 2009 67557 and will expire on July 31,
4 2012, unless renewed.

5 **JURISDICTION**

6 4. Accusation No. 1D 2009 67557 was filed before the Board and is currently
7 pending against Respondent. The Accusation and all other statutorily required documents were
8 properly served on Respondent, and Respondent timely filed her Notice of Defense contesting the
9 Accusation. A copy of Accusation No. 1D 2009 67557 is attached as Exhibit A

10 **ADVISEMENT AND WAIVERS**

11 5. Respondent has carefully read, fully discussed with counsel, and
12 understands the charges and allegations in Accusation No. 1D 2009 67557. Respondent has also
13 carefully read, fully discussed with counsel, and understands the effects of this Stipulated
14 Settlement and Disciplinary Order ("Stipulation".)

15 6. Respondent is fully aware of his legal rights in this matter, including the
16 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
17 counsel at his own expense; the right to confront and cross-examine the witnesses against him;
18 the right to present evidence and to testify on his own behalf; the right to the issuance of
19 subpoenas to compel the attendance of witnesses and the production of documents; the right to
20 reconsideration and court review of an adverse decision; and all other rights accorded by the
21 California Administrative Procedure Act and other applicable laws.

22 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
23 each and every right set forth above.

24 **CULPABILITY**

25 8. Respondent does not contest that, at an administrative hearing,
26 Complainant could establish a prima facie case with respect to the charges and allegations
27 contained Accusation No. 1D 2009 67557.

28 9. Respondent agrees his Physical Therapist license is subject to discipline

1 and agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary
2 Order below.

3 CONTINGENCY

4 10. This Stipulation shall be subject to approval by the Physical Therapy Board
5 of California. Respondent understands and agrees that counsel for Complainant and the staff of
6 the Physical Therapy Board of California may communicate directly with the Board regarding
7 this stipulation and settlement, without notice to or participation by Respondent or his counsel.
8 By signing the Stipulation, Respondent understands and agrees that he may not withdraw his
9 agreement or seek to rescind the Stipulation prior to the time the Board considers and acts upon it.
10 If the Board fails to adopt this Stipulation as its Decision and Order, the Stipulated Settlement and
11 Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible
12 in any legal action between the parties, and the Board shall not be disqualified from further action
13 by having considered this matter.

14 11. The parties understand and agree that facsimile copies of this Stipulated
15 Settlement and Disciplinary Order, including facsimile or electronic signatures thereto, shall have
16 the same force and effect as the originals.

17 12. In consideration of the foregoing admissions and stipulations, the parties
18 agree that the Board may, without further notice or formal proceeding, issue and enter the
19 following Disciplinary Order:

20 DISCIPLINARY ORDER

21 **IT IS HEREBY ORDERED** that Physical Therapist license No. PT 23371 issued
22 to Respondent Warren Scott Cornwell is revoked. However, the revocation is stayed and
23 Respondent is placed on probation for the period of time beginning on the effective date of this
24 Decision and continuing until Respondent is successfully discharged from the Diversion Program
25 plus one (1) year from the Respondent's discharge.

26 1. **RESTRICTION OF PRACTICE – PRESENCE OF ANOTHER**
27 **PHYSICAL THERAPIST REQUIRED** Respondent shall be prohibited from working any
28 shift in which there is no other physical therapist on duty. Respondent shall be in the physical

1 presence of another physical therapist during each shift Respondent works.

2 2. RESTRICTION OF PRACTICE- HOME CARE

3 Respondent shall not provide physical therapy services in a patient's home.

4 3. RESTRICTION OF PRACTICE- SOLO PRACTICE Respondent

5 shall be prohibited from engaging in the solo practice of physical therapy.

6 4. RESTRICTION OF PRACTICE - PROHIBITION OF SELF

7 EMPLOYMENT OR OWNERSHIP Respondent shall not be the sole proprietor or partner in
8 the ownership of any business that offers physical therapy services. Respondent shall not be a
9 Board member or an officer or have a majority interest in any corporation that offers or provides
10 physical therapy services.

11 5. RESTRICTION OF PRACTICE- ADMINISTRATION OR

12 POSSESSION OF CONTROLLED SUBSTANCES Respondent shall not administer or
13 possess any controlled substances as defined in the California Uniform Controlled Substances
14 Act. This prohibition does not apply to medications lawfully prescribed to Respondent for a bona
15 fide illness or condition by a practitioner licensed to prescribe such medications. This restriction
16 shall not apply to the administration of medications by Respondent to persons undergoing
17 physical therapy in the form of iontophoresis – usually performed with a drug called
18 dexamethasone, or in the form of phonophoresis – usually performed with a drug called a
19 hydrocortisone cream.

20 6. PROHIBITION OF POSSESSION OR USE OF CONTROLLED

21 SUBSTANCES/ALCOHOL Respondent shall abstain completely from the personal use or
22 possession of controlled substances as defined by Section 4211 of the Business and Professions
23 Code, or any drugs requiring a prescription. This prohibition does not apply to medications
24 lawfully prescribed to Respondent for a bona fide illness or condition by a practitioner licensed to
25 prescribe such medications. This restriction shall not apply to the administration of medications
26 by Respondent to persons undergoing physical therapy in the form of iontophoresis – usually
27 performed with a drug called dexamethasone, or in the form of phonophoresis – usually
28

1 performed with a drug called a hydrocortisone cream. Respondent shall abstain completely from
2 the use of alcoholic beverages.

3 7. **BIOLOGICAL FLUID TESTING** Respondent shall immediately submit
4 to biological fluid testing, at Respondent's cost, upon the request of the Board or its designee. A
5 certified copy of any laboratory test results may be received in evidence in any proceedings
6 between the Board and the Respondent. Failure to submit to, or failure to complete the required
7 biological fluid testing, is a violation of probation.

8 8. **RECOVERY PROGRAM** Within 15 days from the effective date of this
9 decision, respondent shall enroll and participate in the Board's Diversion Program at respondent's
10 cost until the diversion program determines that participation in the Diversion Program is no longer
11 necessary. Failure to comply with requirements of the Diversion Program, terminating the program
12 without permission or being expelled for cause shall constitute a violation of probation by respondent
13 and respondent shall be immediately suspended from the practice of physical therapy. Respondent
14 shall comply with all components of the diversion program. This includes the fact that the Board
15 may receive reports on all aspects of respondent's participation in the diversion program.
16 Respondent shall sign a release authorizing the diversion program to report all aspects of the
17 diversion program as requested by the Board or its designee. In the event the Board's diversion
18 program is unavailable, respondent shall participate in a diversion program approved by the
19 Board or its designee. It is hereby acknowledged that respondent is already enrolled in a Board
20 approved Diversion Program called Maximus, and that he has complied with all components of
21 the diversion program, including signing a release authorizing Maximus to report to the Board all
22 aspects of respondent's participation in the diversion program.

23 9. **OBEY ALL LAWS** Respondent shall obey all federal, state and local
24 laws, and statutes and regulations governing the practice, inspections and reporting, of physical
25 therapy in California and remain in full compliance with any court ordered criminal probation.

26 10. **COST RECOVERY** Respondent is ordered to reimburse the Board for
27 the actual and reasonable investigative and prosecutorial costs incurred by the Board in the
28 amount of \$2,396.00. Said costs shall be reduced, however, and the remainder forgiven, if

1 Respondent pays \$1,000.00 within 30 days of the effective date of the Decision. In the event
2 Respondent fails to pay within thirty (30) days of this Decision, the full amount of costs shall be
3 immediately due and payable. Failure to pay the ordered reimbursement, or any agreed upon
4 payment, may constitute a violation of the probation order. The filing of bankruptcy by
5 Respondent shall not relieve Respondent of his responsibility to reimburse the Board. If
6 Respondent is in default of his responsibility to reimburse the Board, the Board will collect cost
7 recovery from the Franchise Tax Board, the Internal Revenue Service or by any other means of
8 attachment of earned wages legally available to the Board. Failure to fulfill the obligation could
9 also result in attachment to the Department of Motor Vehicle registrations and/or license
10 renewals.

11 11. **COMPLIANCE WITH ORDERS OF A COURT** Respondent shall be
12 in compliance with any valid order of a court. Being found in contempt of any court order is a
13 violation of probation.

14 12. **COMPLIANCE WITH CRIMINAL PROBATION AND PAYMENT**
15 **OF RESTITUTION** Respondent shall not violate any terms and conditions of any criminal
16 probation and shall be in compliance with any restitution ordered, payments or other orders.

17 13. **QUARTERLY REPORTS** Respondent shall submit quarterly
18 declarations under penalty of perjury on forms provided by the Board, stating whether there has
19 been compliance with all the conditions of probation.

20 14. **PROBATION MONITORING PROGRAM COMPLIANCE**
21 Respondent shall comply with the Board's probation monitoring program.

22 15. **INTERVIEW WITH THE BOARD OR ITS DESIGNEE** Respondent
23 shall appear in person for interviews with the Board, or its designee, upon request at various
24 intervals.

25 16. **NOTIFICATION OF PROBATIONER STATUS TO EMPLOYERS**
26 Respondent shall notify all present and future employers of the reason for and the terms and
27 conditions of the probation by providing a copy of the Accusation and the Decision and Order, or
28 Stipulated Settlement to the employer, and submit written employer confirmation of receipt to

1 the Board within 10 days. The notification(s) shall include the name, address and phone number
2 of the employer, and, if different, the name, address and phone number of the work location.

3 17. **NOTIFICATION OF CHANGE OF NAME OR ADDRESS**

4 Respondent shall notify the Board, in writing, of any and all name and/or address changes within
5 ten (10) days.

6 18. **RESTRICTION OF PRACTICE - TEMPORARY SERVICES**

7 **AGENCIES** Respondent shall not work for a temporary services agency or registry.

8 19. **RESTRICTION OF PRACTICE - CLINICAL INSTRUCTOR OF**
9 **PHYSICAL THERAPY STUDENT INTERNS OR FOREIGN EDUCATED PHYSICAL**
10 **THERAPIST LICENSE APPLICANTS PROHIBITED**

11 Respondent shall not supervise any
12 physical therapy student interns, foreign educated physical therapist license applicants or other
13 individuals accumulating hours or experience in a learning capacity in physical therapy during the
14 entire period of probation. Respondent shall terminate any such supervisory relationship in
15 existence on the effective date of this probation.

16 20. **PROHIBITED USE OF ALIASES** Respondent shall not use aliases and
17 shall be prohibited from using any name which is not his/her legally-recognized name or based upon a
18 legal change of name.

19 21. **INTERMITTENT WORK** If Respondent works less than 192 hours as a
20 physical therapist or a physical therapist assistant in the physical therapy profession in a period of
21 three months, those months shall not be counted toward satisfaction of the probationary period.
22 Respondent shall notify the Board if he works less than 192 hours in a three-month period.

23 22. **TOLLING OF PROBATION** The period of probation shall run only
24 during the time Respondent is practicing or performing physical therapy within California. If,
25 during probation, Respondent does not practice or perform within California, Respondent is
26 required to immediately notify the probation monitor in writing of the date that Respondent is
27 practicing or performing physical therapy out of state, and the date of return, if any. Practicing or
28 performing physical therapy by Respondent in California prior to notification to the Board of the
Respondent's return will not be credited toward completion of probation. Any order for payment

1 of cost recovery shall remain in effect whether or not probation is tolled.

2 23. **VIOLATION OF PROBATION** Failure to fully comply with any
3 component of any of the probationary terms and conditions is a violation of probation. If
4 respondent violates probation in any respect, the Board, after giving respondent notice and the
5 opportunity to be heard, may revoke probation and carry out the disciplinary order that was
6 stayed. If an accusation or petition to revoke probation is filed against respondent during
7 probation, the Board shall have continuing jurisdiction until the matter is final, and the period of
8 probation shall be extended until the matter is final.

9 24. **REQUEST TO SURRENDER LICENSE DUE TO RETIREMENT,**
10 **HEALTH OR OTHER REASONS** Following the effective date of this probation, if
11 Respondent ceases practicing or performing physical therapy due to retirement, health or other
12 reasons or is otherwise unable to satisfy the terms and conditions of probation, Respondent may
13 request to surrender his license to the Board. The Board reserves the right to evaluate
14 Respondent's request and to exercise its discretion whether to grant the request or to take any
15 other action deemed appropriate and reasonable under the circumstances. Upon formal
16 acceptance of the tendered license, the terms and conditions of probation shall be tolled until such
17 time as the license is no longer renewable, the Respondent makes application for the renewal of
18 the tendered license or makes application for a new license.

19 25. **COMPLETION OF PROBATION** Respondent shall comply with all
20 financial obligations required by this Order (e.g., cost recovery, restitution, probation costs) not later
21 than 180 calendar days prior to completion of probation unless otherwise specified in Order. Upon
22 successful completion of probation, respondent's license shall be fully restored.

23 28. **CALIFORNIA LAW EXAMINATION - WRITTEN EXAM**
24 **ON THE LAWS AND REGULATIONS GOVERNING THE PRACTICE OR**
25 **PERFORMANCE OF PHYSICAL THERAPY** Within 90 days of the effective date of this
26 decision, Respondent shall take and pass the Board's written examination on the laws and
27 regulations governing the practice of physical therapy in California. If Respondent fails to pass
28 the examination, Respondent shall be suspended from the practice of physical therapy until a

1 repeat examination has been successfully passed. Respondent shall pay the costs of all
2 examinations.

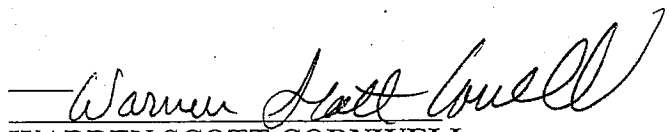
3 29. PRACTICE OR PERFORMANCE OF PHYSICAL THERAPY
4 WHILE ON PROBATION It is not contrary to the public interest for the Respondent to
5 practice and/or perform physical therapy under the probationary conditions specified in the
6 disciplinary order. Accordingly, it is not the intent of the Board that this order, the fact that the
7 Respondent has been disciplined, or that the Respondent is on probation, shall be used as the sole
8 basis for any third party payer to remove Respondent from any list of approved providers.

9 30. PROBATION MONITORING COSTS Respondent shall reimburse all
10 costs incurred by the Board for probation monitoring during the entire period of probation.
11 Respondent will be billed at least quarterly. Such costs shall be made payable to the Physical
12 Therapy Board of California. Failure to make ordered reimbursement within 60 days of the
13 billing shall constitute a violation of the probation order.

14
15 ACCEPTANCE

16 I have carefully read the above Stipulated Settlement and Disciplinary Order and
17 have fully discussed it with my attorney, George Strasser. I understand the Stipulation and the
18 effect it will have on my Physical Therapist license. I enter into this Stipulated Settlement and
19 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
20 Decision and Order of the Board.

21 DATED: 9-13-2011.

22
23 
24 WARREN SCOTT CORNWELL
25 Respondent

26 ///

27 ///

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1 I have read and fully discussed with Respondent Warren Scott Cornwell the terms
2 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
3 Order. I approve its form and content.

4 DATED: 9/13/2011.

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6 
7 **GEORGE STRASSER**
8 *Attorney for Respondent*

9
10 **ENDORSEMENT**

11 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
12 submitted for consideration by the Physical Therapy Board.

13 DATED: Sept 19, 2011.

14
15 EDMUND G. BROWN JR., Attorney General
16 of the State of California

17 
18 **JANNSEN L. TAN**
19 Deputy Attorney General

Attorneys for Complainant

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8 *Attorneys for Complainant*

9
10 **BEFORE THE**
PHYSICAL THERAPY BOARD OF CALIFORNIA
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

13 **WARREN SCOTT CORNWELL, P.T.**
14 **452 West Nees Avenue, #103**
15 **Fresno, California 93711**

16 Physical Therapist License Number PT 23371

17 Respondent.

Case No. 1D 2009 67557

ACCUSATION

18
19 Complainant alleges:

20 **PARTIES**

21 1. Steven K. Hartzell ("Complainant") brings this Accusation ("Accusation") solely in
22 his official capacity as the Executive Officer of the Physical Therapy Board of California,
23 Department of Consumer Affairs ("Board").

24 2. On or about July 2, 1998, the Board issued physical therapist license number PT
25 23371 ("license") to Warren Scott Cornwell, P.T., ("Respondent"). Said license is renewed and
26 current, and will expire unless renewed on July 31, 2012.

27 ///

FILED
STATE OF CALIFORNIA
PHYSICAL THERAPY BOARD OF CALIFORNIA
SACRAMENTO, CA November 12, 2010
BY [Signature] ANALYST

JURISDICTION

3. This Accusation is brought before the Board under the authority of the statutory provisions set forth, *infra*. All section references are to the California Business and Professions Code ("Code") unless otherwise indicated.

4. The practice of physical therapists is governed by the Physical Therapy Practice Act, which is codified at Code sections 2600-2695. The practice of physical therapists is also governed by the provisions of the Medical Practice Act, which is codified at Code sections 2000 et. seq. And, as pursuant to section 101(ab), the Board falls under the penumbra of the Department of Consumer Affairs, Code sections 475-499 provide statutory authority relative to the denial, suspension, and revocation of licenses issued by the Board.

5. Under Code section 2602, the Board is statutorily charged with the enforcement and administration of, *inter alia*, disciplinary actions against its licensees. Pursuant to Code section 2602.1, public protection is mandated to be the Board's highest priority.

6. Section 2609 of the Code states:

The [B]oard shall issue, suspend, and revoke licenses and approvals to practice physical therapy as provided in this chapter.

7. Section 2660 of the Code, in relevant part, provides:

The [B]oard may, after the conduct of appropriate proceedings under the Administrative Procedure Act, suspend for not more than 12 months, or revoke, or impose probationary conditions upon any license, certificate, or approval issued under this chapter for unprofessional conduct that includes, but is not limited to, one or any combination of the following causes:

...

(e) Habitual intemperance.

(f) Addiction to the excessive use of any habit-forming drug.

(g) Gross negligence in his or her practice as a physical therapist or physical therapist assistant.

8. Under section 2234 of the Code, a licensee who is charged with unprofessional conduct is subject to disciplinary action by the Board.

1 9. Section 2239(a) of the Code provides, in relevant part, as follows:

2 [T]he use of...alcoholic beverages, to the extent, or in
3 such a manner as to be dangerous or injurious to the licensee,
4 or to any other person or to the public, or to the extent that
5 such use impairs the ability of the licensee to practice medicine
6 safely, or more than one misdemeanor...involving the use,
7 consumption, or self-administration of any of the substances
8 referred to in this section...constitutes unprofessional conduct.
9 The record of the conviction is conclusive evidence of such
10 unprofessional conduct.

11 10. Section 2661.5(a) of the Code provides:

12 In any order issued in resolution of a disciplinary proceeding before
13 the [B]oard, the [B]oard may request the administrative law judge
14 to direct any licensee found guilty of unprofessional conduct to pay
15 to the board a sum not to exceed the actual and reasonable costs of
16 investigation and prosecution of the case.

17 **FIRST CAUSE FOR DISCIPLINE**

18 **(Gross Negligence)**

19 **[B&P Code § 2660(g)]**

20 11. Respondent is a physical therapist. At the time the events giving rise to the instant
21 Accusation occurred, Respondent was employed by a company called CareerStaff Unlimited
22 ("CSU"), which contracts to provide physical therapy services to patients in a variety of settings,
23 including hospitals, skilled nursing facilities, outpatient treatment centers, and schools.

24 12. On or about July 17, 2009, Respondent was working as a physical therapist at
25 Madera Community Hospital ("MCH") in Madera, California, pursuant to a contract for services
26 between CSU and MCH. On that day, multiple patients and other staff members noted that
27 Respondent smelled of alcohol. As a result of those complaints, Respondent was asked to
28 consent to a drug and alcohol screen pursuant to MCH's drug-free workplace policy, to which he
29 agreed.

30 13. At approximately 11:58 a.m., a blood sample was collected from Respondent, and
31 at approximately 12:05 p.m., a urine sample was collected from Respondent. Prior to submitting
32 to the blood and urine collection, Respondent denied having had any alcohol that day. He did

1 state that he "drinks at night to relax", and that he had consumed alcohol the previous night. The
2 urinalysis was positive for the presence of alcohol in an unspecified amount, while the blood
3 sample indicated a blood alcohol level of .12%. Respondent was subsequently terminated from
4 his employment for coming to work while under the influence of alcohol.

5 14. On or about April 28, 2010, an investigator from the Department of Consumer
6 Affairs Division of Investigation, interviewed Respondent regarding the events of July 17, 2009.
7 During the interview, Respondent agreed that his blood alcohol level that day was indicative of
8 being impaired in performing his duties as a physical therapist. Respondent stated that prior to
9 testing positive for alcohol on July 17, 2009, he had been trying to quit drinking on his own for
10 approximately 8-9 months, but had been unsuccessful in his efforts. Respondent admitted to the
11 investigator that he had developed a physical dependence to alcohol, and that he was consuming
12 up to ten drinks per day.

13 15. Following Respondent's positive blood alcohol screen, at least two of
14 Respondent's co-workers at MCH reported having smelled alcohol beverages on Respondent's
15 person on more than one occasion prior to the July 17, 2009, blood alcohol screen. They also
16 reported having seen Respondent sleeping during working hours while he was on duty.

17 16. Respondent's behavior in providing and/or attempting to provide physical therapy
18 services to MCH patients on or about July 17, 2009, while under the influence of alcohol
19 constitutes an extreme departure from the standard of care, and thereby subjects Respondent's
20 physical therapist license to discipline pursuant to Code § 2660(g).

21 **SECOND CAUSE FOR DISCIPLINE**

22 **(Use of Alcohol in an Injurious or Dangerous Manner)**

23 **[B&P Code § 2239(a)]**

24 17. Complainant hereby incorporates paragraphs 12-15 of the instant Accusation as
25 though fully set forth herein.

26 18. Respondent's behavior in being under the influence of alcohol while providing
27 services as a physical therapist constitutes unprofessional conduct, and subjects Respondent's
28 physical therapist license to discipline pursuant to Code § 2239(a).

///

THIRD CAUSE FOR DISCIPLINE

(Habitual Intemperance/Addiction to Excessive Use of Habit-Forming Drug)
[B&P Code §§ 2660(e)-(f)]

19. Complainant hereby incorporates paragraph 14 of the instant Accusation as though fully set forth herein.

20. Respondent's habitual use and addiction to alcohol constitutes unprofessional conduct, and subjects Respondent's physical therapist license to discipline pursuant to Code §§ 2660 (e)-(f).

PRAYER


WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Physical Therapy Board of California issue a decision:

1. Revoking or suspending physical therapist license number PT 23371, which was issued to Warren Scott Cornwell, P.T., on or about July 2, 1998;

2. Ordering Warren Scott Cornwell, P.T., to pay the Physical Therapy Board of California the reasonable costs of the investigation and enforcement of this case, pursuant to B&P Code section 2661.5; and,

3. Taking such other and further action as deemed necessary and proper.

DATED: 11-12-2010


STEVEN K. HARTZELL
Executive Officer
Physical Therapy Board
Department of Consumer Affairs
State of California
Complainant

SA2010102341
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DECLARATION OF SERVICE BY CERTIFIED MAIL

In the Matter of the Accusation Against:

Warren Scott Cornwell, PT

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 2005 Evergreen St, Suite 1350, Sacramento, California 95815. I served a true copy of the attached:

STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY;
GOVERNMENT CODE SECTIONS 11507.5; 11507.6; 11507.7; NOTICE OF
DEFENSE FORM (2)

by mail on each of the following, by placing same in an envelope (or envelopes)
addressed (respectively) as follows:

NAME AND ADDRESS

CERT No.

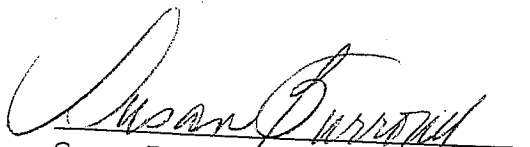
Warren Scott Cornwell
West Nees Avenue, #103
Fresno, CA 93711

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W. David Corrick, DAG
1300 I Street, Suite 125
Sacramento, CA 94244-2550

Said envelopes were then, on November 12, 2010 seal
States mail in Sacramento, California, the county in w
mail with the postage thereon fully prepaid, and retu

Executed on November 12, 2010 in Sacramento, Cali
perjury under the laws of the State of California that


Susan Burrows, DECLARANT

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PS Form 3800 August 2006